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December 28, 2022

Scott Harris
Clerk of the Supreme Court
1 First Street
Washington, D.C. 20543

Re: *Huffman v. Harris*, Case No. 22-474

Dear Mr. Harris:

I am writing on behalf of the Petitioners to respond to Respondent's request for a 50-day extension of time to respond to the Petition for Writ of Certiorari in this case. Petitioners' considered position follows.

The Petition was filed on November 16, 2022, after which Respondents had the ability to respond by December 16, 2022 under Rule 15(3). Instead of doing so, a notice of appearance was filed by counsel along with a waiver of a response on December 15, 2022. The Petition was distributed the next day for a conference on January 6, 2023. The day following, December 22, 2022, the Court requested a response to be filed 32 days hence, by January 23, 2022.

On December 28, 2022, Respondent asked for an additional *50-days* for a combined 82-day extension through March 14, 2023, with the explanation that counsel had been recently retained and needed time to review the record, study the case law, and prepare the brief. Respondent also noted that counsel has "several other briefs" with approaching deadlines.

The Memorandum Concerning The Deadlines For Cert Stage Pleadings that is posted on the Court's website indicates that a request for extension of more than 30 days should include a statement as to Petitioner's position on the extension and that "[e]xtensions beyond 30 days are possible but depend on the circumstances and the views of the other parties to the case." Here, Respondent did not contact Petitioners before asking for the 50-day extension let alone indicate Petitioners' position in their request. Moreover, under the circumstances, such a lengthy extension may not be reasonable as it would result in a four-month extension of time from when the Petition was filed on November 16, 2022. In addition, trial of the case has been set by the district court for March 6, 2023, which pre-dates the requested extension date of March 14 for Respondents to oppose the Petition. (Exhibit.)

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Petitioners hesitate to oppose any reasonable request for an extension of time particularly in this Court and given the gravity of the issues presented in this case. Under the circumstances, however, Petitioners respectfully suggest that an extension of no more than 30 days, through February 22, 2022, would be reasonable for Respondent to respond to the Petition. This position is stated with the utmost respect for the ability of Respondent's capable counsel to adequately address the issues with the assistance of the trial attorneys who have been involved in the action since its commencement.

Very truly yours,

FREEMAN MATHIS & GARY, LLP

/s/ Philip W. Savrin

Philip W. Savrin

PWS/rt
Enclosure

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI**

RE-NOTICE

RACHEL HARRIS,
*Guardian of Steven Jessie Harris
on behalf of Steven Jessie Harris*

V.

CASE NO. 1:18CV167 M-P

CLAY COUNTY, MISSISSIPPI, ET AL.

TAKE NOTICE that a proceeding in this case has been SET for the place, date, and time set forth below:

Place	Room Number
UNITED STATES FEDERAL BUILDING 911 JACKSON AVENUE OXFORD, MISSISSIPPI 38655	COURTROOM 3 EAST-THIRD FLOOR
	DATE AND TIME
	MONDAY, MARCH 6, 2023, 9:40 AM

Type of Proceeding:

MVD/JURY TRIAL BEFORE U.S. DISTRICT JUDGE MICHAEL P. MILLS

DAVID CREWS, Clerk of Court

/s/Sallie Wilkerson

(BY) Sallie Wilkerson - Courtroom Deputy Clerk

DATE: August 25, 2022

To:

Carlos Eugene Moore. (electronic notice only)

Robert Mark Hodges (electronic notice only)

James A. Bryant (electronic notice only)

Charles E. Cowan (electronic notice only)

Pride Doran (electronic notice only)

John G. Wheeler (electronic notice only)

Rebecca B. Cowan (electronic notice only)

Michael D. Chase (electronic notice only)

Mary Jo Woods (electronic notice only)

Lisa Williams McKay (electronic notice only)

Rex Morris Shannon, III (electronic notice only)

William Robert Allen (electronic notice only)

Christina J. Smith (electronic notice only)

**CONTACT SALLIE WILKERSON AT 662/281-3041 or by email Sallie_Wilkerson@msnd.uscourts.gov
IF YOU HAVE ANY QUESTIONS.**